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**THE KILLIAN FIRM, P. C.**  
ATTORNEYS AT LAW

January 12, 2025

**VIA PACER**

Hon. Elizabeth A. Pascal, U.S.M.J.  
Michael H. Cohen Building & U.S. Courthouse  
Fourth Street & Cooper Street  
Courtroom: 5C  
Camden, NJ 08101

**Re: Copeland v. Poliquin Performance Center 2 LLC D/B/A Poliquin Group, et al.  
Case No. 1:19-cv-20278-ESK-EAP**

Dear Judge Pascal:

This firm represents the Poliquin Defendants in this matter. Currently pending before Your Honor is a Motion to Withdraw as Attorney filed by this firm (“the Motion”), calendared for an in-person hearing on January 15, 2025. The Motion was originally scheduled for January 9, 2025.

I have had the opportunity to consult with Caroleen Kandel, in her individual capacity, and in her capacity as a representative for the Poliquin corporate entities. Based on my conversation with Ms. Kandel, I am informed that the Poliquin corporate entities are no longer operational due to financial constraints, and are in the process of winding down their operations. She further informed me that she intends to travel from Florida to appear for the scheduled hearing, and had made hotel and flight travel reservations to travel to New Jersey for the previously scheduled January 9, 2025 hearing date. Further, upon the hearing having been rescheduled from January 9, 2025 to January 15, 2025, Ms. Kandel cancelled the reservations and paid the requisite cancellation fees.

Ms. Kandel further informs me that because of the limited time allotted to make new reservations, the flight costs are unusually high, and between the cancellation costs and the

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unusually high flight costs, she is not in a financial position to make travel arrangements for January 15, 2025 at a sensible rate, and thus, would not be able to appear. Therefore, on Ms. Kandel's behalf, I respectfully request that the Court either 1.) permit Ms. Kandel to appear virtually on January 15, 2025, or 2.) adjourn the in-person hearing for approximately two weeks, such as to allow time for Ms. Kandel to make travel arrangements at more reasonable travel rates.

Thank you in advance for your time and consideration.

Yours truly,  
**THE KILLIAN FIRM, P.C.**

By: /s/ Dimitri Teresh

Dimitri Teresh

